

# Exhibit A

Samuel A. Schwartz, Esq.  
Nevada Bar No. 10985  
Bryan Lindsey, Esq.  
Nevada Bar No. 10662  
Schwartz Flansburg PLLC  
6623 Las Vegas Blvd. South, Suite 300  
Las Vegas, Nevada 89119  
Telephone: (702) 385-5544  
Facsimile: (702) 385-2741  
Attorneys for Debtor

**UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA**

In re: ) Case No. 15-15954  
)  
Pierce Development Inc., ) Chapter 11  
)  
Debtor. ) Hearing Date: November 25, 2015  
)  
) Hearing Time: 1:30 p.m.  
)

**DECLARATION OF CHRISTINA THOMAS IN SUPPORT OF DEBTOR'S APPLICATION  
FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT AND  
RETENTION OF CHRISTINA THOMAS AS REAL ESTATE AGENT FOR THE DEBTOR**

Christina Thomas, being duly sworn, deposes and says:

1. I am over the age of eighteen, mentally competent, and unless otherwise indicated, I have personal knowledge of the facts set forth herein. I make this Declaration in support of the application of Pierce Development, Inc. (the "**Debtor**") for authorization pursuant to section 327 of title 11 of the United States Code and Rule 2014 of the Federal Rules of Bankruptcy Procedure for the entry of an order authorizing my employment as real estate agent for the Debtor.

2. I am a licensed real estate broker in the state of California and have over seven years of experience selling residential real estate.

3. Additionally, I have been an Associate Broker with Berkshire Hathaway Home Services since July 2015. I also maintain the following professional designations:

a. Bachelors Degree in Business Management;

b. Won several awards such as the Top 40 under 40 entrepreneurs from Modern Luxury, Coolest downtown broker award in 2009.

4. The Debtor proposes to compensate me at my customary rate, which is six percent (6%) of the gross sale price from the sale of the Debtor's property located at 7080 Rancho La Cima Dr., Rancho Santa Fe, CA 92067, which is to be paid at closing. Or, in the event a buyer's agent brings forth a ready and able buyer, I will offer 3% of the gross sale price to the buyer's agent from my 6% compensation, which will also be paid at closing.

5. To the best of my knowledge, I do not hold or represent any interest adverse to the Debtor or its estate with respect to any of the matters for which my retention is sought. Additionally, I do not have any connection with the Debtor or its estate.

6. Further, to the best of my knowledge, I do not have any connection with creditors holding secured or unsecured claims against the Debtor. In addition, I do not have any connection with any creditors or other parties-in-interest, or their respective attorney or accountants, or the United States Trustee or any of its employees.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DocuSigned by:

*Christina Thomas*

2BEE102DE20B405...

Christina Thomas, Associate Broker,  
Berkshire Hathaway Home Services  
California License No. 01457793